

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF SOUTH CAROLINA

Michael Brown  
[Enter the full name of the plaintiff in this action]

) Civil Action No. 2:13-CV-310-RMG-BM  
(to be assigned by Clerk)

)  
)v.  
Charleston County Detention Center  
C.O.s Morgan, Gaffney, Wilder, Brothers  
A. Jones, Warrenburg, Fischer  
) COMPLAINT  
) State Prisoner  
) 2013 FEB - 5 A 10:36  
) USDC, CLERK, CHARLESTON, SC  
) RECEIVED  
) Enter above the full name of defendant(s) in this action )

I. PREVIOUS LAWSUITS

- A. Have you begun other lawsuits in state or federal court dealing with the same facts involved in this action or otherwise related to your imprisonment? Yes        No ✓
- B. If your answer to A is Yes, describe the lawsuit in the space below. If there is more than one lawsuit, describe the additional lawsuits on another piece of paper using the same outline.

1. Parties to this previous lawsuit:

Plaintiff: Michael Brown

Defendant(s): C.O.s Morgan, Gaffney, Wilder, Brothers, A. Jones, Warrenburg, Fischer

2. Court: South Carolina, Charleston

(If federal court, name the district; if state court, name the county)

3. Docket Number: \_\_\_\_\_

4. Name(s) of Judge(s) to whom case was assigned: \_\_\_\_\_

5. Disposition: \_\_\_\_\_

(For example, was the case dismissed?Appealed? Pending?)

6. Approximate date of filing lawsuit: \_\_\_\_\_

7. Approximate date of disposition: \_\_\_\_\_

## II. PLACE OF PRESENT CONFINEMENT

- A. Name of Prison/Jail/Institution: \_\_\_\_\_
- B. What are the issues that you are attempting to litigate in the above-captioned case? defamation of character
- C. (1) Is there a prisoner grievance procedure in this institution? Yes        No ✓  
 (2) Did you file a grievance concerning the claims you are raising in this matter? Yes        No ✓  
 When \_\_\_\_\_ Grievance Number (if available) \_\_\_\_\_
- D. Have you received a final agency/departmental/institutional answer or determination concerning this matter (i.e., your grievance)? Yes        No ✓
- E. When was the final agency/departmental/institutional answer or determination received by you? N  
*If possible, please attach a copy of your grievance and a copy of the highest level decision concerning your grievance that you have received.*
- F. If there is no prison grievance procedures in this institution, did you complain to prison, jail, or institutional authorities? Yes ✓ No \_\_\_\_\_
- G. If your answer is YES:
1. What steps did you take? I had my family call the jail
  2. What was the result? Nothing change

## III. PARTIES

*In Item A below, place your name, inmate number, and address in the space provided. Do the same for additional plaintiffs, if any.*

- A. Name of Plaintiff: Michael Brown Inmate No.: \_\_\_\_\_  
 Address: 8464 Rice Basket Ln

*In Item B below, place the full name of the defendant, his official position, and place of employment in the space provided. Use Item C for additional defendants, if any.*

- B. Name of Defendant: Charleston County Detention Center Position: Correctional Officer  
 Place of Employment: 3841 Leeds Ave

C. Additional Defendants (provide the same information for each defendant as listed in Item B above):

Morgan, Gaffney, Wilder, Genther, A. Jones, Warrenburg, Fischer

**IV. STATEMENT OF CLAIM**

*State here, as briefly as possible, the facts of your case. Describe how each defendant is involved. Include also the names of other persons involved, dates, and places. Do not give any legal arguments or cite any cases or statutes. If you intend to allege a number of related claims, number and set forth each claim in a separate paragraph. Use as much space as you need. Attach an extra sheet if necessary.*

While I was incarcerated 3-10 to 8-11 my reputation was slandered. C.D. A. Jones told fellow employees I like little boys. Co-workers C.D. Morgan, Genthers and Gaffney told everyone in the unit I was housed in causing a security threat. When I was moved to another unit (I-D) another C.O.'s made comments of me being a faggot named Mrs. Wilder. She also asked inmates to beat me up. After I was moved to protective custody C.O.'s Warrenberg and Fischer asked inmates if they would kill me for money. After I bonded out everyone was calling me a faggot and a child molester.

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## V. RELIEF

*State briefly and exactly what you want the court to do for you.*

I would like to sue Charleston County Detention Center for allowing their employees to handle this manner unprofessionally

**I declare under penalty of perjury that the foregoing is true and correct.**

Signed this 25 day of Sept, 2012.

Michael Brown

*Signature of Plaintiff*